

**BASIN ELECTRIC  
POWER COOPERATIVE**

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June 3, 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, DC 20554

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FCC MAIL BRANCH

Re: ET Docket No. 92-9

Dear Ms. Searcy:

Enclosed are an original plus four copies of Basin Electric Power Cooperative's comments on the Notice of Proposed Rulemaking, FCC 92-20, released February 7, 1992, regarding the above docket number.

Sincerely,

Robert L. McPhail  
General Manager

RLM/CMO/mw  
Enclosures  
cc: D. Price

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List ABCDE

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the matter of )

Redevelopment of Spectrum to )  
Encourage Innovation in the )  
Use of New Telecommunications )  
Technologies )

ET Docket No. 92-9

To: The Commission

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

COMMENTS OF BASIN ELECTRIC POWER COOPERATIVE

Pursuant to Section 1.415 of the Commission's Rules, Basin Electric Power Cooperative hereby respectfully submits its comments on the Notice of Proposed Rulemaking (NPRM), FCC 92-20, released February 7, 1992, in the above-captioned matter.

I. Introduction

Basin Electric Power Cooperative (Basin Electric), 1717 East Interstate Avenue, Bismarck, North Dakota, supplies wholesale electric power to its 118 member systems from eight states in the Upper Missouri River Basin Region: North Dakota, South Dakota, Montana, Wyoming, Colorado, Nebraska, Iowa and Minnesota.

Basin Electric currently has 50 of its 66 microwave paths licensed in the private portions of the 1,850 to 2,200 MHz bands. These 50 paths cover a distance of 1170 miles and are used for voice communications, protective relaying, data transmission, supervisory control and switching on the transmission system. Protection and control of the power

transmission system is becoming increasingly complex. As energy demands increase and power systems become more interdependent, Basin Electric's communication needs will likely increase at a 10% to 20% rate.

Utility-owned private microwave systems such as Basin Electric's must be available to provide the high reliability and quality demanded for communications channels used by the power transmission control system. No other technology can provide this level of service at an economically feasible cost for the large geographic area that Basin Electric serves.

## II. The 1850-2200 MHz Band Should Not Be Reallocated For The Creation of a Spectrum Reserve

Basin Electric strongly believes that the 1850-2200 MHz frequency should not be reallocated for the creation of spectrum reserve for the developing of emerging technologies. If Basin Electric is forced to move to other frequencies, the only feasible alternative available is the 6.7 GHz band. Moving to this band, for instance, would require Basin Electric to purchase new radios, feedlines, antennas and to modify numerous towers. Basin Electric would be forced to make additional investments in equipment approaching \$6 million, require a minimum of one year of engineering labor and three to four years to implement the changes. System quality could be compromised and the issue of spectrum overcrowding would likely have to be addressed.

Because of the additional increased costs to Basin Electric and to prevent the possibility of less reliable operation in a different spectrum,

Basin Electric urges the Commission to consider alternate bands as a possible home for the spectrum reserve.

### III. Actions To Be Taken If 2 GHz Band Is Reallocated

Basin Electric urges that if the 2 GHz band is reallocated for emerging technologies, that the Commission should grant indefinite co-primary status for all existing 2 GHz microwave systems and should permit reasonable system modifications and expansions. Basin Electric is presently moving two sites which will require the relicensing of three paths. We feel minor expansions such as these should not jeopardize our use of this band or our co-primary status.

We also urge the Commission to adopt rules allowing for the use of voluntary negotiations between licensed users and new service providers. In no circumstances should new services in the band be authorized on an unlicensed basis or any other basis where existing users would be unable to secure reimbursement for relocation or identify interference sources.

### IV. The 1710-1850 MHz Band Should Be Made Available For Displaced 2 GHz Users

Basin Electric urges the FCC and the National Telecommunications and Information Administration (NTIA) to commence discussions to open the 1710-1850 MHz Federal government spectrum for use by displaced 2 GHz users on a co-primary, non-interference basis. Relocating to this frequency would cost Basin Electric in excess of \$2 million.

V. The FCC Should Open the 4, 6 and 11 GHz Bands for Private Microwave Use


Basin Electric supports the Utilities Telecommunications Council "Petition for Rulemaking", filed March 31, 1992, to make the 4 GHz, 6 GHz and 11 GHz common carrier bands available for routine licensing in the Private Operational Microwave Service under Part 94, and to adopt appropriate channeling plans and technical standards to ensure that these bands are adequate to meet the needs of existing and future private microwave systems.

WHEREFORE, Basin Electric Power Cooperative respectfully requests the Commission to consider these comments in acting on the subject Notice of Proposed Rulemaking.

Respectfully submitted,

BASIN ELECTRIC POWER COOPERATIVE

By:

  
Robert L. McPhail  
General Manager